

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

| | | |
|----------------------------------|---|----------------------|
| In the Matter of |) | |
| |) | |
| IP-Enabled Services |) | WC Docket No. 04-36 |
| |) | |
| E911 Requirements for IP-Enabled |) | WC Docket No. 05-196 |
| Service Providers |) | |

**UPDATE TO
PETITION FOR EXTENSION OF TIME AND LIMITED WAIVER**

On November 28, 2005, Vonage America, Inc. (“Vonage”) filed a Petition for Extension of Time and Limited Waiver (“Waiver Petition”) in the captioned proceeding.¹ On December 12, 2005, Vonage filed an Errata to the Waiver Petition. Vonage is filing this update to advise the Commission of the current status of VoIP E911 PSAP readiness as well as to provide revised projections for additional PSAP readiness.

As was discussed in the Waiver Petition, Vonage is capable of transmitting Automatic Number Identification (“ANI”) and Registered Location information for 100% of its subscriber lines. Vonage also explained that it had established connectivity to selective routers for more than 90% of those lines. In the Errata, Vonage reported that as of November 28, 2005, 26% of Vonage’s customers were served by 745 PSAPs capable of receiving E911 service.

¹ The Waiver Petition was filed in Docket 04-36 on November 28, 2005 before midnight, but was not filed in Docket 05-196 until just after midnight on November 29, 2005.

Since November 28, 2005, an additional 824 PSAPs, serving approximately 20.5% of Vonage's customer lines, are now capable of receiving VoIP E911 or VoIP 911 calls² ("Capable PSAPs") -- bringing the current total number of Capable PSAPs to 1569. As of January 24, 2005, approximately 46.5% of Vonage's customer lines have the benefit of call delivery to Capable PSAPs. A complete list of Capable PSAPs is provided in Appendix A.

Vonage has also revised its projections regarding when additional PSAPs whose service areas include Vonage customers with Registered Locations will become Capable. Vonage anticipates that an additional 3480 PSAPs will become capable by March 31, 2006, and 550 more PSAPs will become Capable by June 30, 2006. The lists of these PSAPs are provided in Appendices B and C.

In addition, Vonage has identified PSAPs serving approximately 1.5% of Vonage's customer lines that either are not connected to selective routers or have been listed by the Commission or a state as unable to receive 911 calls. Because these PSAPs are unable to receive 911 calls over the Wireline E911 Network, Vonage is not required to transmit 911 calls to these PSAPs over the Wireline E911 Network. Vonage's safety net national call center will accept 911 calls from customers located within these PSAP areas, and APCO-33 trained call takers at Vonage's call center will locate emergency assistance for these customers.

Lastly, there are some PSAPs for which Vonage has not identified any customers with Registered Locations served by those PSAPs. Vonage is constantly adding new customers and reviewing the status of each of the PSAPs. As Vonage identifies additional PSAPs whose service areas include Vonage customers with Registered Locations, Vonage will take steps to

² Vonage has identified certain PSAPs that -- while connected to the Wireline E911 Network -- are either (1) unable to receive Automatic Location Information ("ALI") or (2) not enhanced and therefore unable to receive ALI and Automatic Number Identification ("ANI").

include those PSAPs in its deployment schedule, and those PSAPs will be included in future updates filed with the Commission.³

Respectfully submitted,

/s/

William B. Wilhelm, Jr.

Tamar E. Finn

Eliot J. Greenwald

Swidler Berlin LLP

3000 K Street, N.W., Suite 300

Washington, D.C. 20007

Telephone: (202) 424-7500

Facsimile: (202) 424-4645

Attorneys for Vonage America Inc.

January 26, 2006

³ For example, since its initial November 28th filing, Vonage has identified additional PSAPs serving new Vonage customers that are included in the Appendices attached to this filing.